

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :
v. : No. 2:20-cr-00045-01-GAM
ABDUR RAHIM ISLAM *et al.*, : (McHugh, J.)
Defendants. :

[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2022, upon consideration of the Government's Motion *In Limine* to Preclude Certain Evidence and Argument (Doc. 126), and any response in opposition, it is **ORDERED** that the Motion is **DENIED**.

BY THE COURT:

Honorable Gerald Austin McHugh
U.S. District Court Judge

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v. : No. 2:20-cr-00045-01-GAM
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Defendants. :

**DEFENDANT ISLAM'S RESPONSE IN OPPOSITION
TO GOVERNMENT'S MOTION *IN LIMINE* TO PRECLUDE
CERTAIN EVIDENCE AND ARGUMENT**

Defendant Abdur Rahim Islam opposes the government's Motion *in Limine* to preclude certain defense evidence and argument. Doc. 126. Defense counsel in this case are experienced practitioners. None of them has a record of courtroom misbehavior. They need not be subjected to the unwarranted and unnecessary restrictions on their diligent representation of their clients requested by the government. Nor does the Sixth Amendment permit the government's attempt to script the trial in advance or limit the proceedings to a presentation of its own theory of the case and no other.

Defendant Islam therefore respectfully requests that the Court deny the government's Motion *in Limine*.

Respectfully submitted,

s/ David Laigaie
ECKERT SEAMANS CHERIN &
MELLOTT
David M. Laigaie, Esquire
(I.D. No.: 63010)
Joshua D. Hill, Esquire
(I.D. No.:93772)
50 S. 16th Street, 22nd Floor
Philadelphia, PA 19102
(215) 851-8400 (Telephone)
(215) 851-8383 (Telecopy)
DLaigaie@eckertseamans.com
Attorneys for Defendant Rahim Islam

/s/Peter Goldberger
Peter Goldberger, Esquire
(I.D. No. 22364)
50 Rittenhouse Place
Ardmore, PA 19003
(610) 649-8200 (Telephone)
(610) 649-8362 (Telecopy)
peter.goldberger@verizon.net
Co-Counsel for Defendant Rahim Islam

CERTIFICATE OF SERVICE

I, Joshua Hill, hereby certify that on this day, I caused the foregoing to be filed electronically with the Case Management/Electronic Case Filing System (“CM/ECF”) for the Federal Judiciary. Notice of this filing will be sent to all parties by operation of the Notice of Electronic Filing system, and the parties to this action may access this filing through CM/ECF.

Dated: January 18, 2022

/s/ Joshua Hill

Joshua Hill